

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division

IN RE:

LYNNISE CULLER

Debtor

Chapter 13

Case No. 25-10056-DJB

LIMOSA LLC

Movant

Docket No. 24

v.

Hearing: April 17, 2025 at 9:30 AM

LYNNISE CULLER
(Debtor)

KAI T, HAKIM-LEWIS
(Co-Debtor)

KENNETH E. WEST
(Trustee)

Respondents

OBJECTION TO CONFIRMATION OF THE PLAN DATED

Now Comes Creditor, Limosa LLC (“Creditor”), by and through its attorneys, Orleans Law Group PLLC, hereby Objects to Confirmation of the Chapter 13 Plan (the “Plan”) of Debtor, Lynnise Culler (“Debtor”), as follows:

1. As of the bankruptcy filing date of January 7, 2025, Creditor holds a secured claim against the Debtor's property located at 8616 Fayette Street, Philadelphia, PA 19150
2. On March 10, 2025, Creditor filed a Proof of Claim citing a secured claim in the amount of \$39,970.30, with pre-petition arrears in the amount of \$39,970.30.
3. The Plan provides for payment to Creditor in the amount of \$38,000.00 for pre-petition arrears. As such, the Plan must be amended to reflect the arrears as described above.
4. The Mortgage is non-modifiable pursuant to 11 U.S.C. § 1322(b)(5)

5. The Plan violates 11 U.S.C. § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6), and requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307(c).

WHEREFORE, Creditor respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Date: April 9, 2025

Respectfully Submitted,

/s/ Elizabeth A. Trachtman

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